1	STEPHANIE M. HINDS United States Attorney		
2	MATHEW W. PILE Associate General Counsel Office of Program Litigation, Office 7 EDMUND DARCHER, Washington State Bar No. 42906		
3			
4	Special Assistant United States Attorney Office of Program Litigation, Office 7		
5	Office of the General Counsel Social Security Administration		
6	6401 Security Boulevard Baltimore, MD 21235		
7	Telephone: (206) 615-2662		
8	Edmund.Darcher@ssa.gov Attorneys for Defendant		
9		DISTRICT COURT	
10			
11	NORTHERN DISTRICT OF CALIFORNIA		
12	SAN FRANCISCO DIVISION		
		CIVIL NO 2:22 01254 WHO	
13	SALEEM IDRISS WASHINGTON,	O CIVIL NO. 3:23-cv-01354-WHO	
14	Plaintiff,	STIPULATION AND [PROPOSED] ORDER FOR VOLUNTARY	
15	vs.	REMAND PURSUANT TO	
16		SENTENCE FOUR OF 42 U.S.C.	
17	KILOLO KIJAKAZI, Acting Commissioner of	9 § 405(g) AND TO ENTRY OF 1 JUDGMENT	
18	Social Security,))	
19	Defendant.))	
20	IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of		
21	record, with the Court's approval, that the above-captioned case should be reversed and remanded for		
22	further administrative proceedings pursuant to sentence four of 42 U.S.C. § 405(g).		
23			
24	On remand, the Commissioner will offer Plaintiff the opportunity for a hearing, further develop		
25	the record as necessary, and issue a new decision.		
26			
27			
28	STIPULATION AND [PROPOSED] ORDER FC 3:23-cv-01354-WHO 1	OR VOLUNTARY REMAND	
	·		

1 The parties further request that the Clerk of the Court be directed to enter a final judgment in 2 favor of Plaintiff, and against Defendant, reversing the final decision of the Commissioner. 3 Respectfully submitted, 4 STEPHANIE M. HINDS 5 United States Attorney 6 Dated: May 17, 2023 By: /s/ Edmund Darcher 7 EDMUND DARCHER 8 Special Assistant U.S. Attorney Attorneys for Defendant 9 Dated: May 17, 2023 /s/ Rachael Louie Holmes 10 (Per Authorization) 11 Attorney for Plaintiff 12 **ORDER** 13 14 Pursuant to stipulation, IT IS SO ORDERED. 15 16 17 18 Dated: May 19, 2023 19 UNITED STATES DISTRICT JUDGE 20 21 22 23 24 25 26 27

STIPULATION AND [PROPOSED] ORDER FOR VOLUNTARY REMAND 3:23-cv-01354-WHO 2

28